

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

**DEFENDANT’S MOTION FOR LEAVE TO FILE OBJECTIONS TO MAGISTRATE  
JUDGE’S ORDER ON TRADE SECRETS ONE DAY LATE**

Defendant and counterclaim plaintiff Voice Signal Technologies, Inc. (“Voice Signal”) moves for leave to file its Memorandum in Support of Objections to Magistrate Judge’s Order on Trade Secrets (the “Objections”) one day late, on April 14, 2005.

Pursuant to Fed. R. Civ. Proc. 72(b), the Objections were due ten (10) days after the Magistrate Judge's March 30, 2005 Order, on April 13, 2005. Under the terms of the parties Protective Order, which was entered by this Court on March 11, 2005, the Objections and supporting documents must be filed under seal because they contain information designated as "Highly Confidential" by plaintiff ScanSoft, Inc. ("ScanSoft").

Voice Signal seeks leave to file one day late because technical difficulties caused Voice Signal to deliver the Objections to its messenger later than planned. Consequently, the messenger was unable gain access to the courthouse on the evening of April 13, 2005. Voice Signal served the Objections by hand on ScanSoft on April 13, 2005.

WHEREFORE, Voice Signal requests that this Court grant it leave to file the Objections on April 14, 2005.

Respectfully submitted,

Dated: April 14, 2005

VOICE SIGNAL TECHNOLOGIES, INC.

By its attorneys,

/s/ Wendy S. Plotkin

Robert S. Frank, Jr. (BBO No. 177240)  
Sarah Chapin Columbia (BBO No. 550155)  
Paul D. Popeo (BBO No. 567727)  
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CERTIFICATE PURSUANT TO LOCAL RULES 7.1

I certify that counsel for Voice Signal attempted to confer with counsel for ScanSoft on April 14, 2005 and April 15, 2005, in an effort to resolve the issues presented in this Application and that counsel for Voice Signal was unable to reach counsel for ScanSoft

/s/ Wendy S. Plotkin

Wendy S. Plotkin